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October 15, 2020

**VIA ECF**

Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

Re: Jessica Denson v. Donald J. Trump for President, Inc.  
United States District Court, Southern District of New York  
Civil Action No. 20-cv-04737 (PGG)

Dear Judge Gardephe:

We represent defendant Donald J. Trump for President, Inc. (the “Campaign”) and write to briefly respond to plaintiff’s October 14, 2020 letter regarding an article written by *The New York Times*, which she purports to be “relevant” to the parties’ pending motions.

Putting aside the propriety of plaintiff’s letter with fully-briefed dispositive motions pending before the Court, plaintiff continues to ignore the fundamental flaw of her standing argument, *to wit*, that she, as the **sole** class representative, must demonstrate individual standing for her lawsuit. She cannot meet this burden by relying on a dispute that some third-party, such as Omarosa Manigault Newman, may have with the Campaign. Indeed, the simple facts here are that Ms. Denson cannot identify any live dispute that she has with the Campaign, especially where she has been freely criticizing the Campaign and President Trump on social media for years and the Campaign has not taken—and, indeed, has stated that it will not take—any action against her for expressing any of these negative opinions or critical views.

Respectfully submitted,

/s/ *Patrick McPartland*

Patrick McPartland

cc: Counsel of record (via ECF)